

ATTACHMENT A

STIPULATION OF FACTS

USDC - BALTIMORE
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The undersigned parties hereby stipulate and agree that the following facts are true and accurate, and that if this matter had gone to trial, the government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter gone to trial.

Tyler Dean Fowler ("Fowler"), age 29, is a former resident of Easton, Maryland.

In October 2019, the parents of Victim 1, a 15-year-old male in Missouri, found communications that were sexual in nature on Victim 1's school issued laptop between Victim 1 and an adult male, later identified as Fowler. A review of the accounts revealed that Fowler had ongoing online contact with Victim 1 using the online applications Discord and Google Hangouts. In his communications with Victim 1, Fowler identified himself as "Tyler Dean Fowler" and provided his true date of birth and address in Easton, Maryland. Records from Discord indicate that the online Discord and Google Hangout usernames and email addresses utilized by Fowler used an IP address subscribed to Fowler's Easton, Maryland address.

During their conversations, Victim 1 told Fowler that he was a 15-year-old high school student. Nonetheless, Fowler discussed his desire to be in a relationship with Victim 1, including that he planned to move to Missouri and that he would "be living under a different name at least for a bit...Till [Victim 1's] 18 birthday."

Additionally, Fowler initiated sexual conversations with Victim 1, including references to bestiality and animal porn (both real and fake animals), frequently including violent rape and torture, initiated by Fowler. For example, in one conversation, Fowler suggested that he and Victim 1 engage in role play as animals (also known as "furries"), and he stated: "So for the kidnapping r[ole]p[lay] how bout your fursona plays a well endowed cub rapist who kidnaps and breaks cubs to sell on the sex trade market but when you take down you decide to keep him[.]" In the same conversation, Fowler asked Victim 1 if he "like[s] the idea of a father son rape team."

On October 13, 2019, Victim 1 sent Fowler a photo of himself with an inanimate object inserted into his anus. Also, on October 14, 2019, Victim 1 sent Fowler another photo of Victim 1's erect penis next to a cologne bottle.

Also during their communications, Victim 1 told Fowler that he had a 10-year-old brother. On multiple occasions, Fowler encouraged Victim 1 to sexually abuse his younger brother. During one conversation, after Victim 1 told Fowler that his 10-year-old brother hit him in his groin, Fowler responded "well to be hones[t] hitting in the balls seems like an open invitation for fucking i[n]m[y]o[pinion] don't you agree." When Victim 1 told Fowler that his mom was in the house, Fowler stated "i have a solution for the mom problem you can make a makeshift gag for your

brother.” Later in the conversation Fowler told Victim 1, “i still wanna see you rape your brother at one point[.]” A week later, after continuing to encourage Victim 1 to sexually abuse his brother, Victim 1 responded that his brother is “too young ... he doesn’t deserve it[.]”


Fowler and Victim 1 also discussed child pornography. During one particular conversation, Fowler told Victim 1 that he was a “shotlover”. “Shota” is a reference to cartoon porn involving minor males, either with other minors or adults. The two discussed 12-year-olds, and Fowler stated: “i mean if i’m feeling the need for deeper ‘debauchery’ i’ll go younger but thats a rare event[.]”

On December 16, 2020, a search warrant was executed at Fowler’s residence in Easton, Maryland. After being Mirandized, Fowler was shown a picture of Victim 1 and identified him as “an old friend.” Fowler also stated that several months prior to the execution of the search warrant he had been viewing child pornography.

A cell phone and laptop belonging to Fowler were seized. These devices were manufactured outside the State of Maryland and traveled to Maryland in foreign and/or interstate commerce. At least 32 files of child pornography were located in cache (a temporary storage location) on the laptop, and 11 files of child pornography were downloaded to and accessible on the cell phone. The majority of the child pornography files on Fowler’s devices, which included videos and images, depicted the rape and torture of infants and toddlers. Below are descriptions of four of those files:

- A video depicting a nude prepubescent girl. There appeared to be a white cloth tied at the girl’s mouth and she was bent over. While the girl was bent over, there was a nude adult male penetrating the girl’s anus (video titled, “7eb7kw0go4kswfgswhok.webm”).
- An image depicting a prepubescent girl with her wrist taped on top of each other and tape over the girl’s mouth. The girl’s legs are spread apart exposing her genitalia, and her legs are taped together and tied to her arms (video titled, “463505602_607491.jpg”).
- An image depicting a nude prepubescent male infant/toddler being penetrated in the anus by an erect penis (image titled, f_000015”).
- An image depicting what appears to be an erect penis being placed on an infant’s mouth (image titled, “f_00001f”).

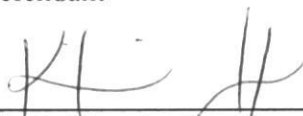
SO STIPULATED:



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